


EXHIBIT B

DECLARATION OF ROBERT K. KELLEY

1. My name is Robert Kelley. I am over 18 and competent to testify. The information contained herein is true and correct and is based on my personal knowledge.
2. I attended law school at the University of California, Berkeley from 1969-1972. I am a member of the District of Columbia Bar and licensed to practice law in D.C.
3. My background includes the Foreign Service in Germany (1966-1969), Law School at the University of California, Berkeley (1969-1972), Wilmer, Cutler, & Pickering Law Firm (1972-1975), Senate Intelligence Committee (1975-1976), Chief of Staff for Senator Charles Mathias (1977), U.S. Embassy in Iraq (2003-2005), Chief Counsel to the National Security Sub-Committee of the U.S. House of Representatives (2006).
4. Currently, I have my own law firm, The Law Offices of Robert Kelley. My practice includes representing foreign governments as well as other persons and businesses. 
5. I knew Bijan Kian when he was at the U.S. Export/Import Bank. He was one of three guys nominated by the President to run the bank.
6. Bijan co-founded the Nowruz Commission which was set up to coordinate a Persian Spring festival each year on the first day of Spring. Bijan was the Vice Chairman and I was the Secretary General.
7. Bijan called me up last year and said that his company had to register with FARA, the Foreign Agents Registration Act. At this time, I was not affiliated with FIG, Flynn Intel Group. It is important to note that I remember he said: "We have to register with FARA at the Justice Department." FARA is an Act, the Foreign Agents Registration Act, but it's administered by the National Security Division of the Department of Justice. You just register on line. Bijan asked me to come out to his house to assist with the registration.
8. A few days later, on a Sunday afternoon, I went to Bijan's house. It was in September of 2016. While there, I said to Bijan: "Is this a foreign government or a foreign political party?" Bijan replied: "No, it's a foreign private company." I said: "Well, you don't have to register at FARA if it's a foreign private company." I asked Bijan if they were going to do any lobbying. Bijan told me that they might. I then said: "You can register with the U.S. Congress under the LDA which is the Lobby Disclosure Act." I also showed him the Federal Register that says it is not necessary for a private company to register with FARA. I did not ask any

additional questions nor did I see the contract. I only asked if it was a private company.

9. Later that same week, I registered the company under the LDA.
10. On the form I had to put down what the company would lobby about. I had no idea so I put the registrant will advise the client on U.S. domestic and foreign policy regarding S.1635 and the House counterpart, and H.R. 1735 and the Senate counterpart. I made this decision on my own without guidance from anyone else.
11. The form also requested the name of who would lobby for the company. I put my name down. Somebody had to put a name down so I decided I would put my name down. I never actually did any lobbying. I made this decision on my own without guidance from anyone else.
12. In October Bijan asked me if I would like to be general counsel and a principal for the Flynn Intel Group. This was a few days after I filed for registration under the LDA. I agreed. Bijan took my picture in front of the Flynn logo at their office at 44 Canal Square, Alexandria, VA., and put it on the website.
13. The next thing was after the November 8th election. Bijan called me and told me to terminate the registration. The reason he gave me was that he was involved with the transition team of President Elect Trump and he was not allowed to be a lobbyist. I terminated the registration. This was on-line.
14. One day in December, on a Friday, I went to the FIG office at 44 Canal Square for a meeting with Bijan. While there, we got Ekim Alptekin on the phone. We called him. Ekim said that his company, INOVA, was a private company and it had no government funding and no relation to the Turkish government. Then Ekim sent us an e-mail to the Flynn Intel Group to that effect. That is, INOVA didn't receive any government funds or have any relationship with any government. It was just a one line e-mail to Bijan. I saw the e-mail.
15. While at this meeting, we received a call from General Flynn. He asked that we reach out to another attorney from Jones Day. I did not make the call but I understand that Bijan did reach out.
16. My involvement with FIG was limited. I did not know about or have any involvement with the op-ed in the Hill Newspaper by General Flynn. Nor did I know about any meeting in New York with Turkish government officials or any other matter involving the Flynn Intel Group. To be complete, on one occasion Bijan asked me to draft a letter to a company in Boston MA. Later, I was told to

disregard writing the letter. On another occasion, Bijan asked that I coordinate a meeting with a friend of mine to see if they were interested in working with FIG. We met two times but nothing ever formed out of these meetings.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on October 27, 2017.

A handwritten signature in black ink, reading "Robert K. Kelley", is written over a horizontal line.

Robert K. Kelley